

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**IN RE:**

**CIRCUIT CITY STORES, INC., et al.**

**DEBTORS.**

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**CASE NO. 08-35653-KRH  
Jointly Administered**

**CHAPTER 11**

**MOTION TO APPEAR *PRO HAC VICE* PURSUANT  
TO LOCAL BANKRUPTCY RULE 2090-1(E) (2)**

1. Neil E. McCullagh (the "Movant"), a member in good standing of the bars of Virginia, Maryland, and admitted to practice before this Court, hereby moves this Court for entry of an Order permitting William A. Wood, III, an partner with the law firm of Bracewell & Giuliani LLP, to appear *pro hac vice*, before this Court on behalf of Panattoni Construction, Inc., Raymond & Main Retail, LLC, Chino South Retail PG, LLC, and Panattoni Development Company, Inc., as Agent for VVI Texas Holdings, LLC, T1 P1 Texas, LLC, Dudley Mitchell Properties TX, LLC, Shelby Properties TX, LLC, and Pintar Investment Properties TX, LLC, Charles L. Kessinger, Jacque L. Kessinger and Northglenn Retail, LLC (the "Panattoni Creditors"), pursuant to Local Bankruptcy Rule 2090-1(E)(2). In support thereof, Movant states as follows.

2. William A. Wood, III is a non-resident of the Eastern District of Virginia, is a and a member in good standing of the bar of the State of Texas and the United States District Court for the Southern, Northern, Western and Eastern Districts of Texas. There are no disciplinary proceedings pending against Mr. Wood.

3. Movant shall serve as co-counsel with Mr. Wood in the bankruptcy case and related proceedings.

4. A copy of this motion has been served upon counsel for the Debtors, counsel for the Official Committee of Unsecured Creditors and the Office of the United States Trustee for the Eastern District of Virginia.

5. Pursuant to Local Rule 9013-1 (L), and because this motion does not present contested issues, Movant requests that the Court rule upon the motion without an oral hearing.

Wherefore, Movant respectfully requests that this Court enter an Order substantially in the form attached hereto permitting William A. Wood, III to appear and be heard *pro hac vice* as counsel to the Panattoni Creditors, in the Debtors chapter 11 bankruptcy cases and grant such other relief as necessary and appropriate.

Dated: December 3rd, 2008.

**CANTOR ARKEMA, P.C.**

By: /s/ Neil E. McCullagh  
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And

**BRACEWELL & GIULIANI LLP**

By: /s/ William A. (Trey) Wood, III  
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**COUNSEL FOR PANATTONI  
CONSTRUCTION, INC., RAYMOND & MAIN  
RETAIL, LLC, CHINA SOUTH RETAIL PG,  
LLC, AND PANATTONI DEVELOPMENT  
COMPANY, INC., AS AGENT FOR VVI  
TEXAS HOLDINGS, LLC, T1 P1 TEXAS, LLC,  
DUDLEY MITCHELL PROPERTIES TX,  
LLC, and PINTAR INVESTMENT  
PROPERTIES TX, LLC, CHARLES L.  
KESSINGER, JACQUES L. KESSINGER AND  
NORTHGLENN RETAIL, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on the parties listed on the attached service list via electronic means as listed on the court's ECF noticing system or by regular U. S. First Class Mail on this 3<sup>rd</sup> day of December, 2008.

/s/ William A. Wood, III  
William A. (Trey) Wood, III

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**ORDER GRANTING ADMISSION *PRO HAC VICE***

Upon the Motion to Appear *Pro Hac Vice* (the "Motion"), and the representations by counsel, David K. Spiro that William A. Wood, III is a practicing attorney in good standing in the State of Texas; it is hereby

ORDERED that William A. Wood, III may appear and practice *pro hac vice* in the above captioned bankruptcy cases and any related adversary litigation on behalf of Panattoni Construction, Inc., Raymond and Main Retail, LLC, Chino South Retail PG, LLC, and Panattoni Development Company, Inc., as Agent for VVI Texas Holdings, LLC, TI PI Texas, LLC, Dudley Mitchell Properties TX, LLC, Shelby Properties TX, LLC, and Pintar Investment Properties TX, LLC, Charles L. Kessinger, Jacque L. Kessinger and Northglenn Retail, LLC; and it is further

ORDERED, that the Motion is hereby GRANTED.

DATE:

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UNITED STATES BANKRUPTCY JUDGE

**CIRCUIT CITY STORES, INC.**  
**PRIMARY SERVICE LIST**

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